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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

ANDREA HOLLINGSWORTH, an individual; A.R.H., a minor by and through her legal guardian and/or parent, Andrea Hollingsworth; and A.D.H., a minor by and through her legal guardian and/or parent, Andrea Hollingsworth,

## **Plaintiffs,**

vs.

CITY OF NORTH LAS VEGAS, Nevada, a Municipal Corporation; JACQUELINE GRAVATT, in her official capacity as Chief of the North Las Vegas Police Department; MICHAEL L. ROSE, an individual; ERIC SPANNBAUER, an individual; DOES I – X

## Defendants.

Case No.: 2:21-cv-02230-CDS-NJK

**STIPULATION AND ORDER TO  
EXTEND PLAINTIFF'S TIME TO  
REPLY TO DEFENDANTS'  
OPPOSITION TO MOTION TO  
COMPEL**

**(THIRD REQUEST)**

Pursuant to Pursuant to LR IA 6-1, Plaintiffs Andrea Hollingsworth, A.R.H., and A.D.H. (“Plaintiffs”), by and through their attorneys of record, Margaret A. McLetchie, Pieter M. O’Leary, and Leo S. Wolpert, with the law firm of McLetchie Law, Leah

1 Wiederhorn, and Brittany Shrader of the National Association of the Deaf, and Defendants,  
2 the City of North Las Vegas, Jacqueline Gravatt, Michael L. Rose, and Eric Spannbauer  
3 (collectively “Defendants”), by and through their attorneys of record, Robert W. Freeman,  
4 Frank A. Toddre, Matthew E. Freeman, with the law firm of Lewis Brisbois Bisgaard &  
5 Smith, LLP (collectively “the Parties”), hereby jointly stipulate as follows:

6         The Parties request an extension of time to reply to the Defendants’ Opposition to  
7 Plaintiffs’ Motion to Compel (ECF No. 61) to be extended four (4) days from the current  
8 deadline of Thursday, February 1, 2024, to Monday, **February 5, 2024**. This is the third  
9 request for an extension of this deadline.

10         This request for an extension of time is not sought for any improper purpose or for  
11 the purpose of delay. This request for extension is based upon Ms. McLetchie’s continued  
12 exhaustion from COVID-19 , which has impacted her ability to devote time and attention to  
13 legal work—including this matter, which, as noted in the previous stipulation regarding the  
14 instant reply deadline, requires her unique attention. (*See* ECF No. 68, p. 2:14-16.)  
15 Furthermore, on January 31, 2024, Ms. McLetchie was informed that her mother needed  
16 surgery—subsequently scheduled for February 2, 2024—which required Ms. McLetchie to  
17 perform coordination and assistance, and provide support to her reply. Although Ms.  
18 McLetchie and other attorneys at McLetchie Law have worked diligently on the instant reply,  
19 more time is necessary to sufficiently brief it. Ms. McLetchie communicated with  
20 Defendants’ counsel, Mr. Toddre, to request the instant extension, and Mr. Toddre agreed to  
21 stipulate to it. Ms. McLetchie appreciates Mr. Toddre’s professional courtesy.

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1           The Parties respectfully request that this Court order the deadline extended as stated  
2 above.

3           DATED this 1<sup>st</sup> day of February, 2024

4           DATED this 1<sup>st</sup> day of February, 2024.

5           MCLETCHIE LAW

6           LEWIS BRISBOIS BISGAARD &  
SMITH LLP

7           */s/ Margaret A. McLetchie*

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33          *Attorney for Defendants*

20           **ORDER**

21          **IT IS SO ORDERED.**

22          Dated this 2nd day of February, 2024.

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24           UNITED STATES MAGISTRATE JUDGE